

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

H. CRISTINA CHEN-OSTER; LISA PARISI; and
SHANNA ORLICH, on behalf of themselves and all
others similarly situated,

Plaintiffs,

-against-

GOLDMAN, SACHS & CO. and THE GOLDMAN
SACHS GROUP, INC.,

Defendants.

No. 10 Civ. 6950 (LBS) (JCF)
NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, dated January 21, 2011, and the Declaration of Adam T. Klein and supporting documents filed therewith, the undersigned counsel for Plaintiffs H. Cristina Chen-Oster, Lisa Parisi, Shanna Orlich and the putative class will move this Court before the Honorable James C. Francis, United States Courthouse, 500 Pearl Street, New York, New York 10007, at a time and date to be determined by the Court, for an Order to Compel Discovery.

Dated: January 21, 2011
New York, New York

By: /s/ Adam T. Klein
Outten & Golden LLP
Adam T. Klein
Cara E. Green
Jennifer L. Liu
Mariko Hirose
3 Park Avenue, 29th Floor
New York, New York 10016
Telephone: (212) 245-1000

Lieff, Cabraser, Heimann & Bernstein, LLP
Kelly M. Dermody (admitted *pro hac vice*)

Anne B. Shaver (admitted *pro hac vice*)
Heather H. Wong (admitted *pro hac vice*)
Alison M. Stocking (admitted *pro hac vice*)
275 Battery Street, 29th Floor
San Francisco, California 94111-3339
Telephone: (415) 956-1000

Attorneys for Plaintiffs and the Putative Class